

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

**AUSTIN WORKS, MICHAEL LYNCH,
CARLTON GRIGSBY, MACK GORDON,
CHAD HOLCOMB, CHARLES TILLMAN,
SOLOMON WILLIAMS, JAY STEVEN SMITH,
TIMOTHY RANDELS, FREDDIE OLIVEAUX,
JASON ALBRITTON, and SHAGREY JONES**

CIVIL ACTION NO. 21cv3567

JUDGE HICKS

VERSUS

**FLOWERS FOODS, INC. and FLOWERS
BAKING COMPANY OF TYLER, LLC**

**MAGISTRATE JUDGE
WHITEHURST**

**UNOPPOSED MOTION FOR LEAVE TO
FILE OPPOSITIONS IN EXCESS OF 25 PAGES**

NOW INTO COURT, through undersigned counsel, come plaintiffs who respectfully request leave of Court to file their Oppositions to Motions for Summary Judgment in excess of the 25 page limit contained in Local Rule 7.8, as follows.

1.

Because of the vast number of pages contained in each of defendants' eleven (11)¹ Motions for Summary Judgment and accompanying documents, some of which are approximately 300 pages, including exhibits, plaintiffs submit that more than 25 pages is required to adequately address contested issues of fact and defendants' arguments.

¹ Rec. Docs. 43 through 43-6; 44 through 44-6; 47 through 47-5; 48 through 48-6; 51 through 51-6; 52 through 52-6; 55 through 55-6; 57 through 57-6; 64 through 64-6; 66 through 66-6; and 67 through 67-6.

2.

Plaintiffs are mindful of the Court's limited time and resources and have attempted to be as brief as possible in addressing the contested material facts. However, this motion is submitted so that the Court may be fully informed on all relevant issues regarding the facts specific to these cases so that justice may be served. Plaintiffs respectfully request that they be granted leave to exceed the Court's normal page limits for plaintiffs' Oppositions to defendants' Motions for Summary Judgment.

3.

Defendants agreed to plaintiffs' request, provided that the Oppositions were limited to 30 pages each, and that the page limit for defendants' replies to each Opposition be extended from 10 to 15 pages.

WHEREFORE, PLAINTIFFS PRAY that an Order issue permitting filing of plaintiffs' Oppositions to defendants' Motions for Summary Judgment in excess of 25 pages to be limited to 30 pages, and that defendants' replies are extended to 15 pages.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of plaintiffs' **UNOPPOSED MOTION FOR LEAVE TO FILE OPPOSITIONS IN EXCESS OF 25 PAGES** was electronically filed with the Clerk of the Court using the CM/ECF system which sent a notice of electronic filing to counsel as indicated by the Court.

Lafayette, Louisiana, this 15th day of February, 2023.

/s/ Steven G. Durio
STEVEN G. DURIO